

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

*Plaintiff,*

v.

SAMSUNG ELECTRONIC CO., LTD and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

*Defendants.*

Case No. 2:22-CV-00422-JRG-RSP

**JURY TRIAL DEMANDED**

**SAMSUNG’S P.R. 4-1 LIST OF PROPOSED TERMS FOR CONSTRUCTION**

Pursuant to Patent Rule 4-1 and the Court’s First Amended Docket Control Order (Dkt. No. 64), Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) identify the following list of claim terms, phrases, or clauses which Samsung contends should be construed by the Court, and Samsung identifies any claim elements which Samsung contends should be governed by 35 U.S.C. § 112(6).

Samsung’s list was compiled based in part on plaintiff Headwater Research, LLC’s (“Headwater”) apparent view of the scope of the claims as identified in Headwater’s P.R. 3-1 infringement contentions and accompanying claim charts served on February 28, 2023, and amended on April 12, 2023. Headwater’s P.R. 3-1 contentions are inadequate and fail to properly identify how Samsung’s accused instrumentalities meet certain elements of the asserted claims. Samsung reserves the right to modify the list below based on any supplemental contentions served by Headwater should Headwater seek to amend its contentions.

In addition, Samsung’s list was compiled prior to receiving Headwater’s proposed list of terms to be construed or their proposed claim constructions. Accordingly, Samsung reserves the

right to modify the list below in light of Headwater's list of terms for construction or proposed claim constructions. Samsung also reserves the right to include within its list of proposed terms for construction the terms included on Headwater's list of proposed claim terms for construction. Samsung will work with Headwater on the preparation of a joint claim construction and prehearing statement pursuant to Patent Rule 4-3 and the Court's Docket Control Order.

**I. U.S. Patent No. 9,137,701**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from that application	2		X

**II. U.S. Patent No. 9,143,976**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from that application	2		X

**III. U.S. Patent No. 9,271,184**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from that application	2		X

**IV. U.S. Patent No. 9,277,433**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from that application	2		X

**V. U.S. Patent No 9,277,445**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from that application	2		X

**VI. U.S. Patent No. 9,521,578**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from the particular application	2		X

**VII. U.S. Patent No. 9,609,544**

Claim Term	Claim(s)	Subject to 112(6)	Indefinite
1. user of the device . . . perceiving any benefit from that application	2		X

**VIII. U.S. Patent No. 10,237,773**

- Proposed Terms for Construction: N/A
- Claims Governed by 35 U.S.C. § 112(6): N/A

**IX. U.S. Patent No. 11,405,224**

- Proposed Terms for Construction: N/A
- Claims Governed by 35 U.S.C. § 112(6): N/A

Dated: October 13, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on October 13, 2023. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Thad C. Kodish

Thad C. Kodish